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Professor Roger Briggs Head of School

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Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

RSB/rc

21 November 2006

Dear Chairman Martin

**Re: Reply Comments  
ET Docket No.06-135 & RM-11271**

As Head of the School of Health Professions and Rehabilitation Sciences at the University of Southampton and Consultant in Elderly Medicine in Southampton University Hospital Trust I support the Alfred Mann Foundation's ("AMF") request that the Commission adopt service rules and allocate up to 20 MHz of spectrum to accommodate new wireless wideband microstimulator devices on a secondary basis. The University of Southampton has supported clinical research using AMF microstimulators to control functional arm and hand movement in post-stroke patients, and anticipate continued involvement in future research using the new wireless microstimulators.

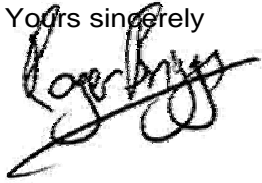
The establishment of a service allocation is vital to the development of a new generation of wireless wideband medical devices designed to restore sensation and function to paralyzed limbs and organs. These devices offer a safer, less invasive, and more effective treatment option than is available with existing equipment.

The Commission's rules currently donot provide any spectrum to permit operation of new wireless wideband microstimulator devices. Although the Commission has allocated some spectrum for medical telemetry operations and for medical implant communications services, this spectrum is not suitable for wideband medical implant devices that require larger bandwidths to perform more complex functions. Without adequate spectrum and service rules to support the operation of these innovative devices, many people will be deprived of a safe and effective medical treatment for their debilitating health conditions.

The Commission's notice of inquiry issued in the above-referenced proceeding is an important first step toward adopting the necessary rules. I

urge the Commission to continue its efforts in this area by expeditiously granting AMF's request for commencement of a separate rulemaking.

Yours sincerely

A handwritten signature in black ink, appearing to read "Roger Briggs", written over the typed name.

Professor Roger Briggs  
**Head of School**

cc: Marlene H. Dortch  
FCC Secretary